

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs)	Case No. 19 CR 277
)	
CONCEPCION MALINEK,)	Judge Edmund Chang
)	
Defendant.)	

**ADDENDUM TO DEFENDANT’S EMERGENCY MOTION FOR FURLOUGH
OR ESCORTED TRIP REGARDING THE DEATH OF HER MOTHER**

NOW COMES the defendant, **CONCEPCION MALINEK**, by and through her attorney, **ROBERT L. RASCIA**, and submits her Addendum to Her Emergency Motion for Furlough or Escorted Trip Regarding the Death of Her Mother.

In support thereof the defendant states as follows:

**I. A DEVELOPMENT WHICH LESSENS THE IMMEDIATE URGENCY
OF THE DEFENDANT’S EMERGENCY MOTION FOR FURLOUGH .**

The defendant filed a motion to revoke her detention order in this case on May 14, 2020. An expedited briefing schedule has already been set for this original motion. On May 18, 2020 the defendant filed a subsequent emergency motion for furlough or escorted trip, pursuant to 28 CFR §551.109(b), requesting permission to attend a viewing of her mother’s remains prior to cremation. The undersigned counsel has now learned that the cremation of the defendant’s mother did occur today as expected and that a post-cremation memorial service will be held by her family on May 27, 2020.

This development obviates the immediate urgency of the defendant's most recent motion for emergency furlough or escorted trip. However, the defendant maintains that her request for permission to attend the post-cremation memorial service would be appropriate as an alternative prayer for relief, which is requested in her pending motion to revoke detention. The defendant will address the substantive merits of this alternative prayer for relief in her reply brief in support of that motion which is due to be filed on May 20, 2020.

Respectfully Submitted,

S/Robert L. Rascia/May 20, 2020

ROBERT L. RASCIA, ARDC No. 6184470

Attorney for the Defendant

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CERTIFICATE OF SERVICE

I, ROBERT RASCIA, deposes and states that, on this 20th day of May, 2020, I have served notice of the foregoing to Assistant United States Attorney Christopher Parente, via ELECTRONIC FILING.

s/Robert L. Rascia/May 20, 2020

ROBERT L. RASCIA, ARDC No. 6184470

Attorney for the Defendant

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